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To: Stuart Hill/R5/USEPA/US@EPA
cc: Mike Ribordy/R5/USEPA/US@EPA
Subject: Sauget Area 2 public comment

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PM

Stuart Hill
Community Involvement Coordinator
U.S.EPA Region 5

Stuart: I sit on Solutia's Community Advisory Panel. There was a meeting last week and there was brief discussion of the plans being proposed for this site. It seemed obvious that a cleanup is targeted to get underway with a lot of questions yet unanswered.

My experience as a resident in the floodplain with groundwater pumps is that they break down--a lot. There are incredible maintenance problems with them. In just ordinary American Bottom groundwater, there is a high iron content in and it has to be treated before it is released into any body of water. I can't imagine with all the chemicals involved in the Sauget Area 2 site--and they are not listed in your fact sheet--what that would do to pumping, treating, etc.

There would undoubtedly be massive maintenance problems with the pumps. IDOT has given up pumping Highway 64 at East St. Louis because it is too expensive to continue pumping and to maintain the pumps.

Solutia's financial status has been shaky of late. If you opt for what you are proposing, will the taxpayers have to pick up the bill for the pumping? That needs to be addressed and the taxpayers need to have the opportunity to comment.

If the barrier method is used, for how long will it be in place? What about the shrink-swell qualities of the soil? What about the groundwater levels changing? When the river is up groundwater flows away from the river? How is that addressed? Will that contaminate other waters?

That area is in the New Madrid fault zone. The bridges just north of the site are being reinforced in anticipation of an earthquake. How would an earthquake affect each method?

Where have these methods been successfully tried? For how long a period?

We have heard there are plans to install other groundwater pumps in the floodplain. Has their impact on this site been evaluated?

What is the area that will be affected by groundwater pumping? How will it affect the area wetlands? How will it affect any structures?

You say the water will be treated before it is released into the river? How? Where will the toxins go? How clean will it be? Who will test it? How often will it be tested? Who will monitor the site? How often? Will there be split samples and independent labs?

Will the toxins volatilize?

I am sure we will have many more questions and I hope you will grant us the 30-day extension we have requested. We strongly objected to the way Dead Creek was "cleaned up" on a "fast track" and the PCBs moved to an impoundment in the floodplain without citizens having the opportunity to comment that they did not want the contaminants and toxins left in the floodplain where they could flood in the future.

We want the contaminated sediments and all the toxic waste removed from both sites, but we don't want you to rush or be rushed into making an unwise choice for the health of the river, the people who get their drinking water from the river and who fish in area waters and the wildlife which will be affected. We hope you will not allow public participation to be circumvented in this related site.

Please grant us a 30-day extension. It would not stop the cleanup; it would allow for citizen review and informed comment. Thank you for your consideration of our comment.

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